

DOCKET NO.: DBD-CV19-6034547-S : **SUPERIOR COURT**
BEARRIN RAY COWARD : **J.D. OF DANBURY**
VS. : **AT DANBURY**
RIDGID TOOL COMPANY (A/K/A RIDGE TOOL :
COMPANY), HOME DEPOT U.S.A., INC., US : **JUNE 16, 2020**
GRANITE, INC., and EMERSON ELECTRIC CO. :

US GRANITE, INC.'s OBJECTIONS TO PLAINTIFF'S INTERROGATORIES

7. State, including by address, who designed the product.

ANSWER: Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge.

8. State as precisely as possible when and where the product was manufactured.

ANSWER: Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge.

9. List all components, materials, chemicals, solutions and/or ingredients that are part of the product.

ANSWER: Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge.

10. Name the source of each component, material, chemical, solution and/or ingredient that is part of the product.

ANSWER: Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge.

17. If you contend that the product was of merchantable quality and fit for the purpose intended, specify (in detail) any and all testing done on said product as to its merchantability and who (including name and position with the defendant) authorized that said product could be placed into the stream of commerce and when he/she authorized it.

ANSWER: Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge.

22. State whether the product was ever the subject of a recall and if so, state:

a. The reason for the recall;

- b. When the recall was issued; and
- c. How the recall was issued.

ANSWER: Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge. Nonetheless, and without waiving said objection, [redacted].

33. State as fully as you possibly can what transpired at the time of the purchase of the product, so far as it may be material to the matter alleged in the plaintiff's complaint.

ANSWER: Defendant objects to this Interrogatory as overly broad, vague, and unduly burdensome and seeking information that is not reasonably calculated to lead to the discovery of relevant, admissible evidence. Nonetheless, ... [redacted].

35. Was any announcement made to the public at large concerning the usability of the product in respect to its purported fitness for use and, if so, set forth the manner in which such representation, if any, was made.

ANSWER: Defendant objects to this Interrogatory as overly broad, vague, and unduly burdensome and seeking information that is not reasonably calculated to lead to the discovery of relevant, admissible evidence. Further, Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge. Nonetheless, without waiving such objection, ... [redacted].

39. Identify any written document upon which a claim or defense you intend to use at trial is founded.

ANSWER: Defendant objects to this Interrogatory as overly broad, vague, and unduly burdensome. Further, Defendant objects to this Interrogatory as premature in light of the fact that discovery is in its infancy and still ongoing. Defendant will identify its trial exhibits in accordance with the Connecticut Practice Book. Without waiving such objection, see response to Interrogatory #38.

40. Identify all documents that you intend to introduce into evidence at trial, including documents the expert or experts that you intend to have testify on your behalf at trial have reviewed and/or relied upon in forming their opinions, or are otherwise relevant to this case.

ANSWER: Defendant objects to this Interrogatory as premature in light of the fact that discovery is in its infancy and still ongoing. Defendant will make any expert discovery disclosures and identify its trial exhibits in accordance with the Connecticut Practice Book.

42. What is your understanding or contention with respect to how the occurrence in question occurred, and how and why the Plaintiff sustained her injuries?

ANSWER: Defendant objects to this Interrogatory to the extent it seeks information protected by the work product doctrine, attorney-client privilege, or other applicable privilege. Further objects as

discovery is in its infancy and therefore defendant reserves the right to supplement its response. Without waiving such objection, [redacted].

43. What governmental, industry or safety organization standards, codes or regulations do you claim pertain to the manufacture of the product and/or to its design? State for each standard the date such standard was promulgated, the sponsoring body, any citation used to refer to said standard(s) and whether you claim such standard was complied with in connection with the product in question.

ANSWER: Defendant objects to this Interrogatory as overly broad, vague, and unduly burdensome and seeking information that is not reasonably calculated to lead to the discovery of relevant, admissible evidence. Further, Defendant objects to this Interrogatory on the grounds that it seeks information from third parties and which is not within its possession, custody, control, or personal knowledge.

Dated: New York, New York
June 16, 2020

Yours etc.,



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CERTIFICATION

I certify that a copy of this document was delivered electronically on June 16, 2020, to all parties of record and that written consent for electronic delivery was received from all attorneys receiving electronic delivery.

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